

Timothy C. Travelstead, Esq. (SBN 215260)

*t.travelstead@narayantravelstead.com*

Scott C. Ku, Esq. (SBN 314970)

*s.ku@narayantravelstead.com*

NARAYAN TRAVELSTEAD P.C.

7901 Stoneridge Drive, Suite 230

Pleasanton, CA 94588

Telephone: (650) 403-0150

Attorneys for Plaintiffs

HINDU AMERICAN FOUNDATION;

SAMIR KALRA; MIHIR MEGHANI;

SANGEETHA SHANKAR; DILIP AMIN; SUNDAR IYER;

RAMANA KOMPELLA; AND DOES ONE TO THREE

IN THE UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF CALIFORNIA

HINDU AMERICAN FOUNDATION, INC.,  
a Florida Not For Profit Corporation; Samir  
Kalra Mihir Meghani; Sangeetha Shankar;  
Dilip Amin, Sundar Iyer, Ramana Kompella  
as individuals; and Doe Plaintiffs One to  
Three

Plaintiffs,

vs.

KEVIN KISH, an individual, in his official  
capacity as Director of the California Civil  
Rights Department; and DOES 1 - 50,  
inclusive,

Defendants.

Case No. 2-22-CV-01656-DAD-JDP

**DECLARATION OF DOE TWO ISO  
MOTION TO PROCEED UNDER  
PSEUDONYM**

Date: November 21, 2023

Time: 1:30 p.m.

Judge: Dale A. Drodz

Date Action Filed: September 20, 2022

1 I, DOE TWO, declare as follows:

2 1. I am a person of South Asian descent and a practicing Hindu who works in the  
3 technology sector and resides in California. I believe that only those who practice Hindu should  
4 be allowed to define Hinduism.

5 2. I understand that the California Civil Rights Department has defined Hindu  
6 beliefs and has defamed my religion by taking the position that the horrors of a caste system,  
7 such as that compared to the discriminatory practices of slavery, is an inherent part of Hinduism.

8 3. The CRD has further falsely tied anyone practicing Hinduism to engaging in caste  
9 discrimination. This has led many people around me to believe that Hindus are inherently  
10 discriminatory. Even at professional workplaces, post-CDR's action, there were non-Hindus  
11 who were disparagingly misinterpreting Hindu Dharma with Hindus having little recourse to  
12 even counter it. Many Hindus have expressly told me that they, like me, disagree with the  
13 CRD's characterization and have suffered and continue to suffer significant harm in our very  
14 fundamental identity and being.

15 4. I have suffered significant mental and spiritual turmoil because of the CRD's act,  
16 as I feel that the government dismisses my right to freedom of expression and religion. They  
17 have essentially stated, and I feel, that if I practice Hindu, I will be seen as a discriminatory  
18 person. I am very concerned about raising my kids in this environment where our religious  
19 practices are misinterpreted and then institutionalized and normalized by the state.

20 5. The CRD's actions have already, and continue to diminish my pride as a person  
21 of Indian descent practicing Hindu. Their claims have, and continue to make me feel  
22 insignificant and hopeless that I could possibly speak up for all the persons I know who disagree  
23 with their false connection of caste to Hinduism.

24 6. I have further suffered and will continue to suffer harm by people who I work and

1 interact with on a daily basis and/or side by side, who have expressed hateful bias towards me  
2 and persons of South Asian descent practicing Hinduism. This hate has extended into internal  
3 company social media channels and I have been ostracized by the many people who simply do  
4 not understand caste and Hinduism.

5 7. Rather than reduce negative stigmas against me, persons of South Asian descent,  
6 and persons who practice Hindu, the CRD has instead highlighted this issue and created a  
7 fragmented environment of fear and confusion.

8 8. If people know my personal information, I fear that they will try to harm or  
9 retaliate against me or my family, either physically or in some other way. I also fear that the  
10 CRD will come after me and/or interfere with my employer, resulting in permanent negative  
11 reputational and economic harm to me or those in my family.

12 9. I have witnessed even a Hindu non-profit serving underprivileged communities  
13 being targeted just because it was a Hindu faith based charity.

14 10. CRD's actions have normalized misinterpretation of Hindu Dharma and this has  
15 resulted in stereotyping and targeting of Hindus including me even in professional circles.

16 11. CRD's action has caused stereotyping of persons of South Asian descent and we  
17 are now looked at by many as someone who are inherently biased, affecting our professional  
18 prospects.

19 I declare under penalty of perjury under the laws of the United States that the above is  
20 true and correct. Executed on September 20, 2023, at San Jose, California.

21  
22 /s/ DOE TWO  
23 DOE TWO  
24